



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 5, 2023

**MEMO ENDORSED**

*The hearing is adjourned to  
June 14, 2023 at 10:45 a.m.*

**SO ORDERED:**

*Paul G. Gardephe*  
**Paul G. Gardephe, U.S.D.J.**

*June 6, 2023*

**VIA ECF**

The Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Shabazz McKune*, 9 Cr. 572 (PGG)**

Dear Judge Gardephe:

The parties write jointly to respectfully request an adjournment of the VOSR hearing currently scheduled for Wednesday, June 7, at 10:00 a.m., in the above-captioned case. The parties previously jointly requested, and the Court granted, an adjournment of a May 31 appearance date to June 7. Dkt. 62. In the interim, the parties have agreed in principle to a proposed resolution of the pending specifications and seek a brief period of additional time for defense counsel to confer with the defendant, who is currently detained at the Essex County Correctional Facility, and for the parties to conclude what is left of their nearly complete discussions toward a proposed pre-hearing disposition.

Should these dates be convenient in the event the Court grants this request, the parties are available on Monday, June 12, Tuesday, June 13, and on the mornings of Wednesday, June 14, and Thursday, June 15.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/ Justin Horton  
Justin Horton  
Assistant United States Attorney  
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